

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.  
Technologies, a California corporation;  
MOZILLA FOUNDATION, a California public  
benefit corporation; LAURA CHAMBERS and  
her marital community; WINIFRED MITCHELL  
BAKER and her marital community, and DANI  
CHEHAK and her marital community.

Defendants.

Case No. 2:24-cv-1032-RAJ

**STIPULATION AND [PROPOSED]  
ORDER TO AMEND THE CASE  
SCHEDULE**

**NOTE ON MOTION CALENDAR:**

Plaintiff STEVE TEIXEIRA (“Plaintiff”) and Defendants MOZILLA CORPORATION a.k.a M.F. Technologies (“Mozilla”), MOZILLA FOUNDATION (“Mozilla Foundation”), LAURA CHAMBERS, WINIFRED MITCHELL BAKER, DANI CHEHAK (the “Individual Defendants”) (collectively “Defendants”), on the other, by and through their respective counsel of record, submit the following stipulation with reference to the following facts:

1. Plaintiff initiated this action on June 12, 2024 by privately serving but not filing the Complaint on Mozilla under Washington Civil Rule 3.

2. With the consent of all Defendants, Mozilla filed the Complaint in federal court, removing the action to this Court on July 12, 2024.

3. On August 19, 2024, the Court issued an Order Setting Trial Date and Related Dates (Dkt. No. 16) setting forth the original case deadlines.

4. In light of the Parties' ongoing discovery efforts, the Parties respectfully submit that there is good cause to modify the current pretrial schedule, because doing so will allow the parties the necessary time to move through discovery efficiently and also conserve the Court's and the parties' resources.

5. Counsel for all parties have conferred in good faith and this modification to the trial and case schedule will not cause prejudice to any party.

6. Thus, the Parties stipulate to and jointly submit a request to modify the case schedule set forth in Dkt. No. 16, proposing that expert disclosures and discovery will proceed according to the following revised timeline schedule:

Case Event	Current Date	Proposed New Date
<b>Deadline</b> for Initial Expert Witness Disclosure/Reports Under FRCP 26(a)(2)	Apr. 9, 2025	Jul. 9, 2025
<b>Deadline</b> for Discovery Motions <i>see</i> LCR 7(d)	May 5, 2025	Aug. 11, 2025
<b>Deadline</b> for Rebuttal Expert Reports	May 9, 2025	Aug. 11, 2025
<b>Deadline</b> for Discovery Cutoff	Jun. 9, 2025	Aug. 20, 2025
<b>Deadline</b> for Dispositive Motions	Jul. 8, 2025	Sept. 15, 2025
Jury Trial Date	Oct. 6, 2025	Dec. 8, 2025

WHEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, through their respective counsel, that the case schedule be modified to reflect the dates proposed above.

1 Dated this 26th day of March, 2025.

2 STOKES LAWRENCE, P.S.

3 s/ Mathew L. Harrington

4 Mathew L. Harrington, WSBA No. 33276

5 Amy K. Alexander, WSBA No. 44242

6 Maricarmen C. Perez-Vargas, WSBA No.  
7 54344

8 1420 5<sup>th</sup> Avenue, 30<sup>th</sup> Floor

9 Seattle, WA 98101

10 E-mail: [mathew.harrington@stokeslaw.com](mailto:mathew.harrington@stokeslaw.com)

11 E-mail: [amy.alexander@stokeslaw.com](mailto:amy.alexander@stokeslaw.com)

12 E-mail: [mcpv@stokeslaw.com](mailto:mcpv@stokeslaw.com)

13 *Attorneys for Plaintiff Steve Teixeira*

DLA PIPER LLP (US)

By: s/ Anthony Todaro

Anthony Todaro, WSBA No. 30391

s/ Alexandria Cates

Alexandria Cates, WSBA No. 53786

701 Fifth Avenue, Suite 6900

Seattle, Washington 98104-7029

Tel: 206.839.4800

E-mail: [anthony.todaro@us.dlapiper.com](mailto:anthony.todaro@us.dlapiper.com)

E-mail: [alexandria.cates@us.dlapiper.com](mailto:alexandria.cates@us.dlapiper.com)

*Attorneys for Defendants MOZILLA*

*CORPORATION a.k.a M.F.*

*TECHNOLOGIES, LAURA CHAMBERS,*

*WINIFRED MITCHELL BAKER, and*

*DANI CHEHAK*

SEBRIS BUSTO JAMES P.S.

By: s/ Darren Feider

Darren Feider, WSBA No. 22430

Beth Touschner, WSBA No. 41062

15375 SE 30th Pl., Suite 310

Bellevue, Washington 98007

T: 425 454-4233

E-mail: [dfeider@sbj.law](mailto:dfeider@sbj.law)

E-mail: [btouschner@sbj.law](mailto:btouschner@sbj.law)

*Attorneys for Defendant Mozilla Foundation*

**ORDER**

In accordance with the foregoing stipulation, and good cause appearing therefore, it is so ORDERED.

Dated this \_\_\_\_ day of March, 2025.

---

United States District Judge  
Judge Richard A. Jones

**CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties or their counsel of record.

Dated this 26th day of March, 2025

s/ Lynda M West  
Lynda M West, Legal Executive Assistant